

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Minnesota Voters Alliance, G & J Real
Estate, Well Maintained Apartments,
Garfield Court Partnership, LLP; Marissa
Skaja, and Charles Halverson,

Plaintiffs,

vs.

The City of Saint Paul, Minnesota, a
Minnesota municipality, and the City of
Minneapolis, a Minnesota municipality,

Defendants.

Case No.: 19-CV-358 WMW-HB

**WILLIAM F. MOHRMAN'S REPLY
DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEY FEES, COSTS AND
EXPENSES**

I, William F. Mohrman, make the following declaration under 28 U.S.C. §1746:

1. I am a 33.33% shareholder and founding shareholder of Mohrman, Kaardal & Erickson, P.A., a law firm located in downtown Minneapolis, Minnesota.
2. I have been engaged in the private practice of law in the Minneapolis market since 1985.
3. I have personal knowledge of the facts stated in my declaration.
4. Attached as Exhibit 1, is copy of my firm's billing history regarding the underlying reply memorandum. As billing partner for Mohrman, Kaardal & Erickson, P.A., I reviewed the history for accuracy and eliminated any billing I thought was duplicative or hours unwarranted for the work completed. The Court should note that I eliminated two of my own time entries.
5. Attached is a copy of Exhibit 13 that should have been attached to my initial

declaration. I inadvertently excluded Exhibit 13 and attached Exhibit 15 twice. Exhibit 13 is a copy of the Findings of Fact, Conclusions of Law and Order for Judgment in *Edian Altamirano Flores, et al. v. Spiros Zorbalas, et al.*, Case No. 27-CV-16-14225 (Henn. Cty. Distr. Ct., May 16, 2019). Defendants did not reference this failure in their response. Moreover, if Defendants had needed to rely on this, Defendants could have either contacted me to obtain the correct copy or obtained a copy from the Hennepin County District Court.

I affirm under penalty of perjury that the foregoing is true and correct. Executed on this 15th day of June, 2020.

s/William F. Mohrman
William F. Mohrman